

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

FILED

JUL 20 2021

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHLOE LOUISE STITH,
a/k/a "Chloe Savannah Stith,"
DAVID WILLIAM MORRIS,
BREANNA LYNN SLOAN, a/k/a
"Bee Sloan," a/k/a "B,"
MORGAN LEE BOWMAN,
SARAH MICHELLE HUMBAR, D,
MEGAN LOUISE DETHERAGE,
ARIEL SUE PAIGE DIVINE,
TRE ROBERT ALLEN
ACKERSON,
LANE RYAN BRONSON,
a/k/a "Lane Bronson-Ackerson,"
JACOB RYAN SCRIBNER,
KIMBERLY KAY GRISSOM,
a/k/a "Kimberly Kay Griffitt,"
a/k/a "Kimberly Kay Ackerson,"

Defendants.

Case No. 21-CR-021-GKF

THIRD SUPERSEDING
INDICTMENT

[COUNT ONE: 18 U.S.C. §§ 1151,
1152, 1201(a), and 1201(c) –

Kidnapping Conspiracy Resulting
in Death;

COUNT TWO: 18 U.S.C.

§§ 1201(a)(1) and 2 – Kidnapping
Resulting in Death;

COUNT THREE: 18 U.S.C.

§§ 1151, 1152, 1201(a)(2), and 2 –
Kidnapping in Indian Country
Resulting in Death;

COUNT FOUR: 18 U.S.C.

§§ 1151, 1152, 13, and 2; 21 O.S.
§ 1161.1 – Desecration of a Human
Corpse in Indian Country;

COUNT FIVE: 18 U.S.C.

§§ 1512(k), 1512(a)(2)(C),
1512(b)(3), 1512(c)(1), and
1512(h)(i) – Conspiracy to Tamper
with a Witness, Victim, and
Informant;

COUNTS SIX and EIGHT: 18
U.S.C. §§ 1512(c)(1), 1512(h)(i),
and 2 – Tampering with Documents
and Proceedings by Corruptly
Altering, Destroying, Mutilating,
and Concealing a Record,
Document, and Other Object;

COUNTS SEVEN, NINE, and
TWELVE: 18 U.S.C.

§§ 1512(a)(2)(C), 1512(a)(3)(B)(ii),
1512(a)(3)(C), 1512(h)(i), and 2 –
Tampering with a Witness, Victim,
and Informant by Using and
Threatening Physical Force;

COUNT TEN: 18 U.S.C. §§ 1512(b)(3), 1512(h)(i), and 2 – Tampering with a Witness, Victim, and Informant by Corrupt Persuasion;
COUNT ELEVEN: 18 U.S.C. §§ 1512(a)(2)(C), 1512(a)(3)(C), 1512(h)(i), and 2 – Tampering with a Witness, Victim, and Informant by Using the Threat of Physical Force;
COUNTS THIRTEEN and FOURTEEN: 18 U.S.C. §§ 1513(f), 1513(b)(2), and 1513(g) – Conspiracy to Retaliate Against a Witness, Victim, and Informant]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. §§ 1151, 1152, 1201(a), and 1201(c)]

From on or about July 2020 to on or about the date of this Third Superseding Indictment, within Indian Country in the Northern District of Oklahoma and elsewhere, **BREANNA LYNN SLOAN**, a/k/a “Bee Sloan,” a/k/a “B,” **TRE ROBERT ALLEN ACKERSON**, and **LANE RYAN BRONSON**, a/k/a “Lane Bronson-Ackerson,” non-Indians, together and with others both known and unknown to the Grand Jury, willfully, knowingly, and intentionally combined, conspired, confederated, and agreed to commit offenses against the United States, as described below, resulting in the death of Jolene Walker Campbell on or about July 4, 2020.

Objects of the Conspiracy

1. Kidnapping by unlawfully seizing, confining, inveigling, abducting, carrying away, and holding Jolene Walker Campbell for ransom, reward, and otherwise, and by willfully transporting her in interstate commerce across the state boundaries from Missouri into the Northern District of Oklahoma, resulting in the death of Jolene Walker Campbell, a violation of Title 18, United States Code, Section 1201(a)(1); and
2. Kidnapping by unlawfully seizing, confining, inveigling, abducting, carrying away, and holding Jolene Walker Campbell, an Indian, for ransom, reward, and otherwise within Indian Country in the Northern District of Oklahoma, resulting in the death of Jolene Walker Campbell and the disposal of her dead body in a remote, rural field within Indian Country in Mayes County, Oklahoma, a violation of Title 18, United States Code, Section 1201(a)(2).

Overt Acts

1. In accomplishing the objects of the conspiracy, on or about July 4, 2020, in Joplin, Missouri, Defendant **BRONSON** pointed a firearm at Jolene Walker Campbell's head and forced her into a vehicle;
2. In accomplishing the objects of the conspiracy, Defendant **ACKERSON** and Defendant **SLOAN** used a vehicle between on or about July 4, 2020, and on or about July 5, 2020, to transport Jolene Walker Campbell from Missouri into Cherokee Nation Indian Country within the Northern District of Oklahoma;
3. In accomplishing the objects of the conspiracy, Defendant **ACKERSON** and Defendant **SLOAN** used a vehicle between on or about July 4, 2020, and on or about July 5, 2020, to transport Jolene Walker Campbell into Muscogee Creek Nation Indian Country within the Northern District of Oklahoma; and
4. In accomplishing the objects of the conspiracy, Defendant **ACKERSON** and Defendant **SLOAN** disposed of Jolene Walker Campbell's dead body between on or about July 4, 2020, and on or about July 5, 2020, in a remote, rural field within Indian Country in Mayes County, Oklahoma.

All in violation of Title 18, United States Code, Sections 1151, 1152, 1201(a), and 1201(c).

COUNT TWO
[18 U.S.C. §§ 1201(a)(1) and 2]

Between or about July 4, 2020, and on or about July 5, 2020, in the Northern District of Oklahoma and elsewhere, the defendants, **BREANNA LYNN SLOAN**, a/k/a “Bee Sloan,” a/k/a “B,” **TRE ROBERT ALLEN ACKERSON**, and **LANE RYAN BRONSON**, a/k/a “Lane Bronson-Ackerson,” aiding and abetting each other and others known to the Grand Jury, unlawfully seized, confined, inveigled, decoyed, kidnapped, and carried away Jolene Walker Campbell, whom they believed to be a federal informant, and held for her for ransom, reward, and otherwise, by willfully transporting her in interstate commerce across state boundaries from Missouri into the Northern District of Oklahoma, resulting in the death of Jolene Walker Campbell and the disposal of her dead body in a remote, rural field in Mayes County, Oklahoma.

All in violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT THREE
[18 U.S.C. §§ 1151, 1152, 1201(a)(2), and 2]

Between on or about July 4, 2020, and on or about July 5, 2020, within Indian Country in the Northern District of Oklahoma and elsewhere, **BREANNA LYNN SLOAN**, a/k/a “Bee Sloan,” a/k/a “B,” **TRE ROBERT ALLEN ACKERSON**, and **LANE RYAN BRONSON**, a/k/a “Lane Bronson-Ackerson,” non-Indians, aiding and abetting each other and others known to the Grand Jury, unlawfully seized, confined, inveigled, decoyed, kidnapped, and carried away Jolene Walker Campbell, an Indian whom they believed to be a federal informant, and held her for ransom, reward, and otherwise within Indian Country in the Northern District of Oklahoma, resulting in the death of Jolene Walker Campbell and the disposal of her dead body in a remote, rural field within Indian Country in Mayes County, Oklahoma.

All in violation of Title 18, United States Code, Sections 1151, 1152, 1201(a)(2), and 2.

COUNT FOUR
[18 U.S.C. §§ 1151, 1152, 13, and 2; 21 O.S. § 1161.1]

Between on or about July 4, 2020, and or about July 5, 2020, within Indian Country in the Northern District of Oklahoma, the defendants, **BREANNA LYNN SLOAN**, a/k/a “Bee Sloan,” a/k/a “B,” and **TRE ROBERT ALLEN ACKERSON**, non-Indians, aiding and abetting each other and others known to the Grand Jury, knowingly and willfully desecrated the human corpse of Jolene Walker Campbell, an Indian, for the following purposes:

1. To tamper with evidence of the unlawful killing of Jolene Walker Campbell;
2. To camouflage the death of Jolene Walker Campbell;
3. To dispose of the dead body of Jolene Walker Campbell;
4. To impede and prohibit the detection and prosecution of the unlawful killing of Jolene Walker Campbell; and
5. To disrupt, prohibit, and interfere with any law enforcement agency, any law enforcement office, and the Oklahoma Office of the Chief Medical Examiner in:
 - a. detecting, investigating, examining, determining, identifying, and processing the dead body of Jolene Walker Campbell;
 - b. determining the cause of death of Jolene Walker Campbell and the scene where her dead body was found; and
 - c. conducting any forensic examination and investigation relating to the dead body of Jolene Walker Campbell and her unlawful killing.

All in violation of Title 18, United States Code, Sections 1151, 1152, 13, and 2;
Title 21, Oklahoma Statutes, Section 1161.1.

COUNT FIVE

[18 U.S.C. §§ 1512(k), 1512(a)(2)(C), 1512(b)(3), 1512(c)(1), and 1512(h)(i)]

From on or about July 5, 2020, to on or about the date of this Third Superseding Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **CHLOE LOUISE STITH**, a/k/a “Chloe Savannah Stith,” **DAVID WILLIAM MORRIS**, **BREANNA LYNN SLOAN**, a/k/a “Bee Sloan,” a/k/a “B,” **MORGAN LEE BOWMAN**, **SARAH MICHELLE HUMBARD**, **MEGAN LOUISE DETHERAGE**, **ARIEL SUE PAIGE DIVINE**, **TRE ROBERT ALLEN ACKERSON**, **LANE RYAN BRONSON**, a/k/a “Lane Bronson-Ackerman,” **JACOB RYAN SCRIBNER**, and **KIMBERLY KAY GRISSOM**, a/k/a “Kimberly Kay Griffitt,” a/k/a “Kimberly Kay Ackerson,” together and with others both known and unknown to the Grand Jury, willfully, knowingly, and intentionally combined, conspired, confederated, and agreed to commit offenses against the United States, including:

1. Tampering with a witness, victim, and informant by the use of physical force with intent to hinder, delay, and prevent that person from communicating to a law enforcement officer of the United States information relating to the possible commission of a federal offense, a violation of Title 18, United States Code, Section 1512(a)(2)(C);
2. Tampering with a witness, victim, and informant by the threat of physical force with intent to hinder, delay, and prevent that person from communicating to a law enforcement officer of the United States information relating to the possible commission of a federal offense, a violation of Title 18, United States Code, Section 1512(a)(2)(C);
3. Tampering with a witness, victim, and informant by using intimidation, threats, and corrupt persuasion with intent to hinder, delay, and prevent that person from communicating to a law enforcement officer of the United States information relating to the possible commission of a federal offense, a

violation of Title 18, United States Code, Section 1512(b)(3); and

4. Tampering with documents and proceedings by corruptly altering, destroying, mutilating, and concealing a record, document, and other object with the intent to impair its integrity and availability for use in an official proceeding, a violation of Title 18, United State Code, Section 1512(c)(1).

All in violation of Title 18, United States Code, Sections 1512(k), 1512(a)(2)(C), 1512(b)(3), 1512(c)(1), and 1512(h)(i).

COUNT SIX
[18 U.S.C. §§ 1512(c)(1), 1512(h)(i), and 2]

On or about July 5, 2020, in the Northern District of Oklahoma and elsewhere, the defendants, **CHLOE LOUISE STITH**, a/k/a “Chloe Savannah Stith,” **ARIEL SUE PAIGE DIVINE**, **TRE ROBERT ALLEN ACKERSON**, and **LANE RYAN BRONSON**, a/k/a “Lane Bronson-Ackerson,” aiding and abetting each other and others known to the Grand Jury, knowingly and corruptly altered, destroyed, mutilated, and concealed objects relating to the homicide of Jolene Walker Campbell, whom they believed to be a federal informant, and attempted to do so, with the intent to impair the integrity and availability of those objects for use in an official proceeding, by disposing of Jolene Walker Campbell’s personal belongings, and disposing of her dead body in a remote, rural field within Mayes County, Oklahoma, to make those objects unavailable as evidence in the investigation into the unlawful killing of Jolene Walker Campbell.

All in violation of Title 18, United States Code, Sections 1512(c)(1), 1512(h)(i), and 2.

COUNT SEVEN

[18 U.S.C. §§ 1512(a)(2)(C), 1512(a)(3)(B)(ii), 1512(a)(3)(C), 1512(h)(i), and 2]

On or about July 7, 2020, in the Northern District of Oklahoma and elsewhere, the defendants, **BREANNA LYNN SLOAN**, a/k/a “Bee Sloan,” a/k/a “B,” **MORGAN LEE BOWMAN**, **MEGAN LOUISE DETHERAGE**, **TRE ROBERT ALLEN ACKERSON**, and **LANE RYAN BRONSON**, a/k/a “Lane Bronson-Ackerson,” aiding and abetting each other and others known to the Grand Jury, knowingly used physical force and the threat of physical force against A.T. and C.J., persons known to the Grand Jury, and attempted to do so, with intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the possible commission of federal offenses, specifically, Kidnapping, Obstruction of Justice by Killing a Federal Informant, and Desecration of a Human Corpse in Indian Country, by binding and blindfolding A.T. and C.J., forcing A.T. and C.J. into C.J.’s car, kidnapping and driving A.T. and C.J. to a remote and secluded location, shooting at A.T. with a semi-automatic rifle and telling A.T. to dance, making C.J. listen to A.T. screaming while C.J. remained blindfolded, then warning A.T. and C.J. not to talk to law enforcement.

All in violation of Title 18, United States Code, Sections 1512(a)(2)(C), 1512(a)(3)(B)(ii), 1512(a)(3)(C), 1512(h)(i), and 2.

COUNT EIGHT
[18 U.S.C. §§ 1512(c)(1), 1512(h)(i), and 2]

On or about July 7, 2020, in the Northern District of Oklahoma and elsewhere, the defendants, **BREANNA LYNN SLOAN**, a/k/a “Bee Sloan,” a/k/a “B,” **MORGAN LEE BOWMAN**, **MEGAN LOUISE DETHERAGE**, **TRE ROBERT ALLEN ACKERSON**, and **LANE RYAN BRONSON**, a/k/a “Lane Bronson-Ackerson,” aiding and abetting each other and others known to the Grand Jury, knowingly and corruptly altered, destroyed, mutilated, and concealed objects relating to the kidnapping and assault of A.T. and C.J., and attempted to do so, with the intent to impair the integrity and availability of those objects for use in an official proceeding, by cleaning C.J.’s car with bleach to destroy evidence and make that evidence unavailable in the investigation into the kidnapping and assault of A.T. and C.J, and the conspiracy to tamper with A.T. and C.J. as witnesses, victims, and informants by using force and the threat of force against A.T. and C.J.

All in violation of Title 18, United States Code, Sections 1512(c)(1), 1512(h)(i), and 2.

COUNT NINE

[18 U.S.C. §§ 1512(a)(2)(C), 1512(a)(3)(B)(ii), 1512(a)(3)(C), 1512(h)(i), and 2]

On or about July 19, 2020, in the Northern District of Oklahoma and elsewhere, the defendants, **TRE ROBERT ALLEN ACKERSON**, **LANE RYAN BRONSON**, a/k/a “Lane Bronson-Ackerson,” and **JACOB RYAN SCRIBNER**, aiding and abetting each other and others known to the Grand Jury, knowingly used physical force and the threat of physical force against A.T., a person known to the Grand Jury, and attempted to do so, with intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the possible commission of federal offenses, specifically, Kidnapping, Obstruction of Justice by Killing a Federal Informant, and Desecration of a Human Corpse in Indian Country, by carjacking A.T. at gunpoint to remind and warn A.T. not to talk to law enforcement following news broadcasts on July 17, 2020, about the identification of Jolene Walker Campbell’s body.

All in violation of Title 18, United States Code, Sections 1512(a)(2)(C), 1512(a)(3)(B)(ii), 1512(a)(3)(C), 1512(h)(i), and 2.

COUNT TEN
[18 U.S.C. §§ 1512(b)(3), 1512(h)(i), and 2]

On or about August 8, 2020, in the Northern District of Oklahoma and elsewhere, the defendant, **BREANNA LYNN SLOAN**, a/k/a “Bee Sloan,” a/k/a “B,” aiding and abetting others known to the Grand Jury, knowingly and corruptly persuaded A.T. and C.J., persons known to the Grand Jury, and attempted to do so, with intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the possible commission of federal offenses, specifically, Kidnapping, Obstruction of Justice by Killing a Federal Informant, and Desecration of a Human Corpse in Indian Country, by offering a total of \$1,000 to A.T. and C.J. in exchange for A.T. and C.J. recanting and changing their testimony against **TRE ROBERT ALLEN ACKERSON**.

All in violation of Title 18, United States Code, Sections 1512(b)(3), 1512(h)(i), and 2.

COUNT ELEVEN
[18 U.S.C. §§ 1512(a)(2)(C), 1512(a)(3)(C), 1512(h)(i), and 2]

On or about August 11, 2020, in the Northern District of Oklahoma and elsewhere, the defendants, **DAVID WILLIAM MORRIS**, **SARAH MICHELLE HUMBARD**, and **LANE RYAN BRONSON**, a/k/a “Lane Bronson-Ackerson,” aiding and abetting each other and others known to the Grand Jury, knowingly used the threat of physical force against C.J., a person known to the Grand Jury, and attempted to do so, with intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the possible commission of federal offenses, specifically, Kidnapping, Obstruction of Justice by Killing a Federal Informant, and Desecration of a Human Corpse in Indian Country, in that Defendant **MORRIS** and Defendant **HUMBARD** reminded C.J. about the killing of Jolene Walker Campbell, warned that C.J. was playing with fire, and directed C.J. to drive to the Precious Moments Hotel in Carthage, Missouri, where C.J. met Defendant **BRONSON**, who then demanded that C.J. appear at court the next day and change C.J.’s testimony about TRE ROBERT ALLEN ACKERSON, and threatened that, if not, C.J. would pay for it.

All in violation of Title 18, United States Code, Sections 1512(a)(2)(C), 1512(a)(3)(C), 1512(h)(i), and 2.

COUNT TWELVE

[18 U.S.C §§ 1512(a)(2)(C), 1512(a)(3)(B)(ii), 1512(a)(3)(C), 1512(h)(i), and 2]

On or about August 13, 2020, in the Northern District of Oklahoma and elsewhere, the defendants, **CHLOE LOUISE STITH**, a/k/a “Chloe Savannah Stith,” and **LANE RYAN BRONSON**, a/k/a “Lane Bronson-Ackerson,” aiding and abetting each other and others known to the Grand Jury, knowingly used physical force and the threat of physical force against K.L. and M.M., persons known to the Grand Jury, and attempted to do so, with intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the possible commission of federal offenses, specifically, Kidnapping, Obstruction of Justice by Killing a Federal Informant, and Desecration of a Human Corpse in Indian Country, by covering the eyes of K.L. and M.M. with duct tape, binding the hands of K.L. and M.M. with zip ties, forcing K.L. and M.M. into a car, then kidnapping and driving K.L. and M.M. to a remote and secluded location where Defendant **BRONSON** beat K.L. with his fists while K.L. was still bound, made M.M. watch, told M.M. that he had heard M.M. was talking about the disappearance of Jolene Walker Campbell, and warned that M.M. would be beaten if M.M. talked to law enforcement.

All in violation of Title 18, United States Code, Sections 1512(a)(2)(C), 1512(a)(3)(B)(ii), 1512(a)(3)(C), 1512(h)(i), and 2.

COUNT THIRTEEN
[18 U.S.C. §§ 1513(f), 1513(b)(2), and 1513(g)]

From on or about August 22, 2020, to on or about the date of this Third Superseding Indictment, in the Northern District of Oklahoma and elsewhere, **CHLOE LOUISE STITH**, a/k/a “Chloe Savannah Stith,” and **JACOB RYAN SCRIBNER**, together and with others both known and unknown to the Grand Jury, willfully, knowingly, and intentionally combined, conspired, confederated, and agreed to commit offenses against the United States, including:

1. Engaging in conduct that would thereby cause bodily injury to M.M., a person known to the Grand Jury, and damage the tangible property of M.M., with intent to retaliate against M.M. for any information given by M.M. to a law enforcement officer relating to the possible commission of a federal offense, a violation of Title 18, United States Code, Section 1513(b)(2); and
2. Threatening to engage in conduct that would thereby cause bodily injury to M.M. and damage the tangible property of M.M., with intent to retaliate against M.M. for any information given by M.M. to a law enforcement officer relating to the possible commission of a federal offense, a violation of Title 18, United States Code, Section 1513(b)(2).

All in violation of Title 18, United States Code, Sections 1513(f), 1513(b)(2), and 1513(g).

COUNT FOURTEEN
[18 U.S.C. §§ 1513(f), 1513(b)(2), and 1513(g)]

From on or about April 26, 2021, to on or about the date of this Third Superseding Indictment, in the Northern District of Oklahoma and elsewhere, **TRE ROBERT ALLEN ACKERSON, JACOB RYAN SCRIBNER, and KIMBERLY KAY GRISSOM**, a/k/a “Kimberly Kay Griffitt,” a/k/a “Kimberly Kay Ackerson,” together and with others both known and unknown to the Grand Jury, willfully, knowingly, and intentionally combined, conspired, confederated, and agreed to commit offenses against the United States, including:

1. Engaging in conduct that would thereby cause bodily injury to K.L., a person known to the Grand Jury, and damage the tangible property of to K.L., with intent to retaliate against to K.L. for any information given by K.L. to a law enforcement officer relating to the possible commission of a federal offense, a violation of Title 18, United States Code, Section 1513(b)(2); and
2. Threatening to engage in conduct that would thereby cause bodily injury to K.L. and damage the tangible property of K.L., with intent to retaliate against K.L. for any information given by K.L. to a law enforcement officer relating to the possible commission of a federal offense, a violation of Title 18, United States Code, Section 1513(b)(2).

All in violation of Title 18, United States Code, Sections 1513(f), 1513(b)(2), and 1513(g).

CLINTON J. JOHNSON
Acting United States Attorney



KEVIN C. FLETCHER
Assistant United States Attorney

A TRUE BILL

/s/ Grand Jury Foreperson
Grand Jury Foreperson